

**Comment Submission**  
**Federal Communication Commission**  
**ET Docket Nos. 03–137 and 13–84; FCC 13–39**

**Submitter:** Grassroots Environmental Education o/b/o Belpoggi, Blackman, *et al*  
52 Main Street, Port Washington, NY 11050  
Tel. (516) 883-0887  
email: gee@grassrootsinfo.org

**Subject:** Non-thermal biological effects of non-ionizing radiation (NOI #65, 66)

**Reference:** The Catania Resolution (2002)

**Comment:**

The scientists at the International Conference “State of the Research on Electromagnetic Fields – Scientific and Legal Issues,” organized by ISPEL\*, the University of Vienna and the City of Catania, held in Catania, Italy on September 13th – 14th, 2002, agree to the following:

1. Epidemiological and *in vivo* and *in vitro* experimental evidence demonstrates the existence of electromagnetic field (EMF) induced effects, some of which can be adverse to health.
2. We take exception to arguments suggesting that weak (low intensity) EMF cannot interact with tissue.
3. There are plausible mechanistic explanations for EMF-induced effects which occur below present ICNIRP and IEEE guidelines and exposure recommendations by the EU.
4. The weight of evidence calls for preventive strategies based on the precautionary principle. At times the precautionary principle may involve prudent avoidance and prudent use.
5. We are aware that there are gaps in knowledge on biological and physical effects, and health risks related to EMF, which require additional independent research.
6. The undersigned scientists agree to establish an international scientific commission to promote research for the protection of public health from EMF and to develop the scientific basis and strategies for assessment, prevention, management and communication of risk, based on the precautionary principle.

(signed)

**Fiorella Belpoggi**, Fondazione Ramazzini, Bologna, Italy

**Carl F. Blackman**, President of the Bioelectromagnetics Society (1990-1991), Raleigh, USA  
**Martin Blank**, Department of Physiology, Columbia University, New York, USA  
**Emilio Del Giudice**, Istituto Nazionale di Fisica Nucleare, Milano, Italy  
**Livio Giuliani**, Camerino University - ISPESL\*, Venezia, Italy  
**Settimio Grimaldi**, CNR-Istituto di Neurobiologia e Medicina Molecolare, Roma, Italy  
**Lennart Hardell**, Department of Oncology, University Hospital, Orebro, Sweden  
**Michael Kundi**, Institute of Environmental Health, University of Vienna, Austria  
**Henry Lai**, Department of Bioengineering, University of Washington, USA  
**Abraham R. Liboff**, Department of Physics, Oakland University, USA  
**Wolfgang Löscher**, Department of Pharmacology, Toxicology and Pharmacy, School of Veterinary Medicine, Hannover, Germany  
**Kjell Hansson Mild**, President of the Bioelectromagnetics Society (1996-1997), National Institute of Working Life, Umea, Sweden  
**Wilhelm Mosgöller**, Institute for Cancer Research, University of Vienna, Austria  
**Elihu D. Richter**, Head, Unit of Occupational and Environmental Medicine, School of Public Health, Hebrew University-Hadassah, Jerusalem, Israel.  
**Umberto Scapagnini**, Neuropharmacology, University of Catania, Italy, Member of the Research Comm. of the European Parliament  
**Stanislaw Szmigielski**, Military Institute of Hygiene and Epidemiology, Warsaw, Poland,

\* = Istituto Superiore per la Prevenzione e la Sicurezza del Lavoro, Italy (National Institute for Prevention and Work Safety, Italy)